

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION**

**JENNIFER FORD, ERIC BEARD,**  
and **BRIAN OTTERS**, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

**VETERANS GUARDIAN VA  
CLAIM CONSULTING, LLC,**

Defendant.

**Case No. 1:23-cv-756-CCE-LPA**

**CLASS ACTION**

**MOTION TO SEAL DOCUMENTS SUBMITTED WITH PLAINTIFFS’  
MOTION FOR CLASS CERTIFICATION AND MEMORANDUM IN  
SUPPORT OF PLAINTIFFS’ MOTION FOR CLASS CERTIFICATION**

Pursuant to Local Rule 5.4(c) and the Court’s August 23, 2024 Text Order adopting the parties’ L.R. 5.5 Report, Plaintiffs Jennifer Ford, Eric Beard, and Brian Otters respectfully move for an order sealing Plaintiffs’ Memorandum in Support of Plaintiffs’ Motion For Class Certification and certain Exhibits thereto.

1. On May 16, 2025, Plaintiffs filed their Motion to Certify Class (“Motion”), (ECF No. 70), with a Memorandum of Law and Exhibits in support of the Motion. (ECF No. 71).

2. Among the Exhibits to Plaintiffs’ Memorandum in Support of Plaintiffs’ Motion For Class Certification are excerpts from a deposition transcript and documents and information produced by Defendant Veterans Guardian VA Claim

Consulting, LLC (“Veterans Guardian” or “Defendant”) that Defendant has designated as “Confidential” pursuant to the Consent Protective Order (the “Protective Order”) entered by Magistrate Judge Auld on August 27, 2024 (ECF No. 36).

3. Plaintiffs Memorandum in Support of Plaintiffs’ Motion For Class Certification quotes from and references information from these documents and testimony that Defendant has designated Confidential.

4. Accordingly, Plaintiffs move to seal their Memorandum in Support of Plaintiffs’ Motion for Class Certification and Exs. A, B, and E, (ECF Nos. 71-1, 71-2 and 71-5), to the Memorandum.

5. Plaintiffs are not the designating party claiming confidentiality and do not support the Defendant’s assertions that the materials are confidential. Defendant will be responsible for providing the supporting materials required by L.R. 5.4(c)(3).

6. Undersigned counsel for Plaintiffs emailed Veterans Guardian through counsel on May 13 and May 14, 2025, and identified the materials Plaintiffs intended to submit with their Motion for Class Certification and to ask whether Defendant would narrow its claims of confidentiality and propose redactions to the documents that would permit the documents to be filed publicly without obscuring the substance of the documents relevant to Plaintiffs’ Motion for Class Certification. However, counsel for Defendant represented the Defendant continues to maintain its confidentiality designations.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion and seal information designated as Confidential by Defendant until further order of the Court following consideration of Defendant's supporting materials required by L.R. 5.4(c)(3).

Respectfully submitted this the 16th day of May, 2025

**VARNELL & WARWICK, P.A.**

/s/ Christopher J. Brochu  
Christopher J. Brochu\*  
Brian W. Warwick\*  
Janet R. Varnell\*  
400 N. Ashley Drive, Suite 1900  
Tampa, FL 33602  
Telephone: (352) 753-8600  
bwarwick@vandwlaw.com  
jvarnell@vandwlaw.com  
cbrochu@vandwlaw.com  
ckoerner@vandwlaw.com

**BERGER MONTAGUE PC**

/s/ Jeffrey L. Osterwise  
Shanon J. Carson\*  
Jeff Osterwise (NC Bar No.: 39272)  
Radha Nagamani Raghavan\*  
1818 Market Street  
Philadelphia, PA 19103  
Telephone: (215) 875-4656  
Facsimile: (215) 875-4604  
scarson@bm.net  
josterwise@bm.net  
rraghavan@bm.net

\*Pro Hac Vice

*Appointed Interim Lead Class Counsel for  
Plaintiffs and the Putative Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Christopher J. Brochu \_\_\_\_\_  
Christopher J. Brochu

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION**

**JENNIFER FORD, ERIC BEARD,**  
and **BRIAN OTTERS**, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

**VETERANS GUARDIAN VA  
CLAIM CONSULTING, LLC,**

Defendant.

**Case No. 1:23-cv-756-CCE-LPA**

**CLASS ACTION**

**[PROPOSED] ORDER GRANTING MOTION TO SEAL DOCUMENTS  
SUBMITTED WITH PLAINTIFFS' MOTION FOR CLASS CERTIFICATION  
AND MEMORANDUM IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

For the reasons stated in the Motion to Seal, and upon consideration of the supporting materials submitted by Defendant as required by L.R. 5.4(c)(3), the Court finds and concludes that good cause exists to grant the relief requested.

It is therefore ORDERED that the Motion is GRANTED.

This \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_